

# MEMO ENDORSED

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September 20, 2010

**BY HAND & Via Electronic Mail -**  
**Sullivanysdchambers@nysd.uscourts.gov**

Hon. Richard J. Sullivan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 11793

Re: NAF Holdings, LLC v. Li & Fung (Trading) Limited,  
Case No. 10 CV 5762 (RJS)

Your Honor:

We are co-counsel for the plaintiff NAF Holdings, LLC, the plaintiff in the above-captioned action before you. In accordance with the Order of the Court dated August 31, 2010, the parties were directed to appear for a status conference on Monday, September 27, 2010 at 11:30 AM and were required to deliver to the Court not later than September 17, 2010, a joint letter providing the Court with relevant information regarding the case.

By this letter, plaintiff respectfully applies for a thirty (30) day adjournment of the status conference, as well as a similar extension of time to comply with the Court's Order of August 31, 2010. This application is requested because service upon the defendant, Li & Fung (Trading) Limited, a Hong Kong corporation, is presently being facilitated pursuant to the provisions of the Hague Convention, but has not yet been completed. Accordingly, defendant has not yet appeared in this action; and plaintiff is therefore unable to provide a joint statement regarding the issues in this case pursuant to this Court's Order of August 31, 2010.

This is plaintiff's first application for an extension of time to comply with the Court's August 31, 2010 Order. The undersigned has been unable to obtain the consent of adversary

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counsel to this application because there has not yet been an appearance by defendant in this action.

Respectfully submitted,

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Steven T. Halperin

cc: George Reihner, Esq.  
Wright & Reihner, P.C.

SO ORDERED  
Dated:

  
RICHARD J. SULLIVAN  
U.S.D.J.

The deadline for initial submissions is adjourned until October 19, 2010. The initial conference is adjourned until Friday, October 29, 2010, at 10:30 a.m.